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November 22, 2023

VIA ECF & EMAIL

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *United States v. Hwang, et al.*, 22 Cr. 240 (AKH)

Dear Judge Hellerstein:

On behalf of defendant Bill Hwang, and with the consent of all parties, we write to apprise the Court of the negotiations over the Rule 17 subpoenas and request an adjournment of the conference scheduled for November 27, 2023 to allow further negotiations.

Pursuant to the Court's directive, on November 21, 2023, the parties met with counsel for a significant number of the proposed subpoena recipients (the "Bank Counterparties") and discussed a narrowed set of subpoena requests. The defendants and the Bank Counterparties agreed to hold additional discussions with each Bank Counterparty on an individual basis regarding the specific documents and materials maintained by each Bank Counterparty that would be potentially responsive to the revised subpoena requests that were discussed.

Because these discussions may obviate the need for further Court intervention, the parties respectfully request a two-week adjournment of the conference. This is the first request for an adjournment.

Respectfully submitted,

/s/ Barry H. Berke

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